

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

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In re:                : Chapter 11
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GENTEK INC., et al.,  : Case No. 02-12986 (MFW)
and NOMA COMPANY,      :
                        : Jointly Administered
                        : Debtors.
                        : Related to Docket Nos. 2689, 2701
- - - - - x

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APPELLEES' DESIGNATION OF ADDITIONAL
ITEMS TO BE INCLUDED IN RECORD ON APPEAL

GenTek Inc. ("GenTek") and GenTek Holding, LLC (f/k/a General Chemical Corporation) ("GenTek Holding" or "General Chemical" and, together with GenTek, the "Reorganized Debtors"), reorganized debtors in the above-captioned chapter 11 cases, and JPMorgan Chase Bank, N.A., in its capacity as administrative agent for the Lenders under the GenTek Credit Agreement (together with the Reorganized Debtors, the "Appellees"), hereby designate, pursuant to Rule 8006 of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), the following additional items to be included in the record of the appeal of Tony Newman and Dorothy Lenoir (together, the "California Plaintiffs") of the order entered August

11, 2005 (Docket No. 2687) enjoining the California Plaintiffs from prosecuting certain fraudulent transfer claims:¹

Tab	Date	Document
1	8/28/03	Disclosure Statement With Respect to Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1248)
2	10/3/03	First Modification to Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1444)
3	10/3/03	Declaration of Richard F. NeJame in Support of Confirmation of Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1440)
4	10/3/03	Declaration of Matthew R. Friel in Support of Confirmation of Joint Plan of Reorganization Under Chapter 11, Title 11, United States Code of GenTek Inc., et al., and Noma Company, Debtors (Docket No. 1442)
5	10/3/03	Debtors' Memorandum of Law in Support of Confirmation of Joint Plan of Reorganization (Docket No. 1450)
6	10/20/03	Transcript of Hearing Held October 7, 2003 (Docket No. 1530)
7	5/26/05	Order for Extension of Time (Docket No. 2678)

¹ For purposes of this designation of record, all references to docket numbers include not only the lead document but also all secondary documents filed therewith, including pleadings, memoranda, affidavits, certificates of service and exhibits contained in the docket entry.

8	5/26/05	Order Granting GenTek Inc. and GenTek Holding, LLC Leave to File Reply to Objection of Tony Newman and Dorothy Lenoir to the Motion of GenTek Inc. and GenTek Holding, LLC for Order Enforcing Plan of Reorganization et al. and the Joinder of JPMorgan Chase Bank, N.A. (Docket No. 2679)
9	8/23/05	Declaration of Service (Docket No. 2691)


RESERVATION OF RIGHTS

The Appellees expressly reserve their rights to object to or otherwise to move to strike or to modify some or all of any designation of items to be included in the record on appeal that have been or might later be submitted by any other party.

Dated: Wilmington, Delaware
November 28, 2005

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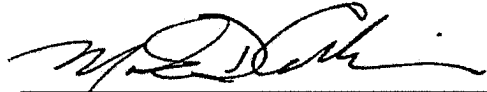
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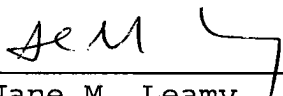
CERTIFICATE OF SERVICE

I, Jane M. Leamy, hereby certify that on this 28th day of November 2005, I caused the foregoing **Appellees' Designation of Additional Items to be Included in the Record on Appeal** to be served on the parties listed below, by first-class mail, postage prepaid:

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